

2 G
Propo.

(35)
11/7/01
vly

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KIM SMITH,

Plaintiff,

v.

JAMES MORGAN, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:
:

Civil No. 1:01-0817

(Judge William W. Caldwell)

(Magistrate Judge Malachy E. Mannion)

FILED
HARRISBURG, PA

NOV 06 2001

MARY E. D'ANDREA, CLERK
Per 9/18
Deputy Clerk

CORRECTIONS DEFENDANTS'
MOTION FOR LEAVE TO DEPOSE PRISONER

The Corrections Defendants, by and through their attorney, John J. Talaber, Assistant Counsel for the Pennsylvania Department of Corrections, pursuant to Federal Rule of Civil Procedure 30(a)(2), respectfully request this Court for leave to depose Plaintiff Kim Smith (CT-2162) within the state correctional system.

Respectfully submitted,



John J. Talaber
Assistant Counsel
Attorney Id. No. 83279

PA Department of Corrections
55 Uteley Drive
Camp Hill, PA 17011
(717) 731-0444
Dated: November 6, 2001

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

KIM SMITH,

Plaintiff,

v.

JAMES MORGAN, et al.,

Defendants.

:
:
:
:
:
:
:
:
:
:

Civil No. 1:01-0817

(Judge William W. Caldwell)

(Magistrate Judge Malachy E. Mannion)

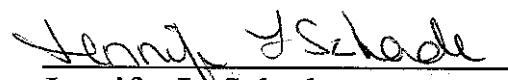
CERTIFICATE OF SERVICE

I undersigned hereby certifies that a copy of the Corrections Defendants' Motion for Leave to Depose Prisoner in this matter was served upon the person(s) in the manner indicated below.

Service by first-class mail
addressed as follows:

Kim Smith, CT-2162
SCI-Coal Township
1 Kelley Drive
Coal Township, PA 17866-1020

James D. Young, Esquire
Lavery, Faherty, Young and Patterson, P.C.
301 Market Street
P.O. Box 1245
Harrisburg, PA 17108-1245


Jennifer L. Schade
Clerk Typist II

PA Department of Corrections
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444
Dated: November 6, 2001